



BEAD

Onboarding Meeting

Sawyer Boldt – Federal Grants Supervisor
Robbie Dailey – Grants Specialist-Advanced
Jessica Hatch – Grants Specialist-Advanced
Nicole Rice – Grants Specialist-Advanced
Holly Soley – Grants Specialist-Advanced

Wisconsin Broadband Office
Public Service Commission of Wisconsin

- Public Service Commission (Federal Grants Team)
- Subrecipient Team
- **Today's Goals:**
 - Go over the grant program as a whole and introduce new and returning grantees to PSC federal award administration.
 - Answer any questions.

Subrecipient Resources

- [Webpage](#)
- Grant Agreement
- PSC BEAD E-mail
- 2 CFR 200
- Other

Subrecipient Tools

- [Electronics Records Filing \(ERF\)](#)
- [Grants Management System \(GMS\)](#)

BEAD Overview

- Regulatory Framework
- Timeline/Sequence

Ongoing Programmatic Requirements

- [Initial Requirements](#)
- [National Environmental Policy Act \(NEPA\)](#)
- [Build America, Buy America \(BABA\)](#)
- [Pre-Construction Utility Meeting](#)
- [Property Standards](#)
- [Audit Requirements](#)
- [Fraud, Waste, and Abuse](#)
- Reporting
- [Performance Measures](#)
- Monitoring
- [Cost Evidencing](#)
- [Milestones/Payment](#)



Subrecipient Resources

WISCONSIN.GOV

Public Service Commission
of WISCONSIN

About PSC For Consumers Commission Actions Service Type eServices News & Events

Search PSC

Broadband Equity, Access, and Deployment Grant

Broadband Expansion

- [Broadband Grant Programs](#)
- [State Broadband Expansion](#)
- [ARPA Broadband Access](#)
- [BEAD Grant Program](#)**
- [Capital Projects Broadband Infrastructure](#)
- [Capital Projects Digital Connectivity and Navigators Program](#)
- [Internet for All Grant Programs](#)
- [Return to Broadband Homepage](#)

Overview

The Bipartisan Infrastructure Law created the Broadband Equity, Access, and Deployment (BEAD) Program with a goal of providing high-speed internet for all Wisconsinites. BEAD will support the deployment of qualifying internet technology that provides service of 100/20 Megabits per second (Mbps) download/upload to all households and businesses in Wisconsin that lack access to 100/20 Mbps. The PSC administered the prequalification and awarding process for the BEAD Program throughout 2024 and 2025. For more information see the [BEAD Process Webpage](#). Past subgranting guidance and documentation can be found in docket [5-BD-2025](#).

Jump to Section

- [BEAD Awards](#)
- [BEAD Subrecipient Resources](#)
- [National Environmental Policy Act \(NEPA\)](#)
- [Federal Guidance Documents and Reference Materials](#)

Additional Grant Details	
Currently Accepting Applications for approved applicants	No Closed: July 28, 2025, 4:59 PM CT
Docket Number	5-BD-2025
Questions Related to Application Process	PSCBEADGrants@wisconsin.gov

The PSC Fraud, Waste and Abuse Hotline accepts tips and complaints about potential fraud, waste, abuse and mismanagement of PSC-administered federal grants. A professional staff member will review your information and determine the appropriate next steps. To report fraud, waste, abuse or mismanagement, please contact the PSC Fraud Hotline at 1-800-225-7729 or 1-608-266-2001 (Local).

[PSC GRANTS SYSTEM LOGIN](#) [GRANTS SYSTEM USER'S GUIDE](#)

BEAD Awards

- [Wisconsin BEAD Approved Awards Map \(June 25, 2026\)](#)

- [PSC Broadband Equity, Access, and Deployment Grant](#)
- Webinars
- Resource/Technical Assistance Documents
- [BEAD Post-Award Program FAQ](#).
- Links
- General Grant Information

BEAD Grant Agreement

Broadband Equity, Access and Deployment Program Grant Agreement

Between the
PUBLIC SERVICE COMMISSION OF WISCONSIN
and
[SUBRECIPIENT]

THIS AGREEMENT is made and entered into by and between the Public Service Commission of Wisconsin (the "Commission"), representing the State of Wisconsin ("State"), and [SUBRECIPIENT] ("Subrecipient") (collectively "Parties") as of Month, DATE, 2026 and shall continue for four years (the "Performance Period") for the XX Project ("Project"). (NTIA Project ID).

WHEREAS, the Commission on behalf of the State, received funds as an Eligible Entity ("Recipient") through the Infrastructure Investment and Jobs Act ("IIJA" or "Infrastructure Act") authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021) also known as the Bipartisan Infrastructure Law, for the purposes of broadband expansion as part of the Broadband Equity, Access and Deployment Program ("BEAD Program"), funded through the United States Department of Commerce ("USDOC") and administered by the National Telecommunications and Information Administration ("NTIA").

WHEREAS, on behalf of the State, the Commission administers the BEAD Grant Program ("Program") to provide funds for eligible activities; and

WHEREAS, the terms and conditions of this Agreement shall survive the Performance Period and shall continue in full force and effect until Subrecipient has completed and is in compliance with all the requirements of this Agreement; and

WHEREAS, this Agreement is exclusive of and is distinguished from all previous agreements between the Subrecipient and the Commission and contains the entire understanding between the Parties; and

WHEREAS, it is the intent of the Parties that this Agreement in all other respects is a "subaward" as defined in 2 CFR § 200.201 and that Subrecipient is a "subrecipient" as defined in 2 CFR § 200.201 and as evaluated under 2 CFR § 200.331; and

WHEREAS, this award is a "fixed amount subaward" as defined in 2 CFR § 200.201 where the major purpose of the subaward is a broadband infrastructure project and will be administered by the Commission pursuant to the Uniform Guidance Policy Notice published by NTIA on December 26, 2023, titled "Policy Notice: Tailoring the Application of Uniform Guidance to the BEAD Program".

NOW, THEREFORE, in consideration of the mutual promises and dependent authorizations, the Parties agree as follows:

THIS AGREEMENT, including its Attachments and any amendments, shall constitute the entire agreement between the parties and no other terms and conditions in any document, acceptance, or acknowledgment shall be effective or binding unless expressly agreed to in writing by the Commission.

This Grant Agreement must be signed by the authorized organization representative and returned to the Commission within 60 days of the initial offer of the Grant Agreement. The Commission may unilaterally withdraw the Award if a signed Grant agreement is not returned within this timeframe.

- #1 resource is your Grant Agreement – a “must read”.
- The Grant Agreement is an important document that goes over definitions and specific programmatic requirements and project scopes.
- A copy of your Executed Grant Agreement lives in the Grants Management System (‘Related Documents’ Tab).
- [Grant Agreement Webinar](#)

- **NTIA Guidance Documents/Resources**

- ✓ [NOFO](#)
- ✓ [Restructuring Policy Notice](#)
- ✓ [NTIA FAQ](#)
- ✓ [General Terms and Conditions](#)

- [2 CFR 200](#) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- **PSC BEAD E-mail:** PSCBEADGrants@wisconsin.gov



Subrecipient Tools

Grants Management System (GMS)

- **General Information**

- ✓ Online portal used to manage your grant project(s) and submit **project-level** documentation.
- ✓ Public can not access
- ✓ Must log-in to be connected by commission to access

- **Functionality**

- ✓ Submit Evidence of Costs ('Expenses' tab)
- ✓ Complete Semi-Annual Reporting ('My Status Reports' – main page)
- ✓ Submit Project-Level Documentation ('Uploads' tab)
- ✓ Request Milestone Review/Completion
- ✓ Maintain Contacts

- **Resources**

- ✓ [Getting Started](#) – how to get logged in and connected to project
- ✓ [Projects Tour](#) – tour of a project

Electronic Records Filing System (ERF)

- **General Information**

- ✓ ERF serves as the Commission's official public facing record and allows for the electronic submission of **entity-level** documentation.
- ✓ Each entity has their own ERF docket (120XX-BD-100).
- ✓ Public can view
- ✓ Must log-in to file to ERF docket

- **Functionality**

- ✓ Upload public facing entity-level documents as requested by the Commission.

- **Resources**

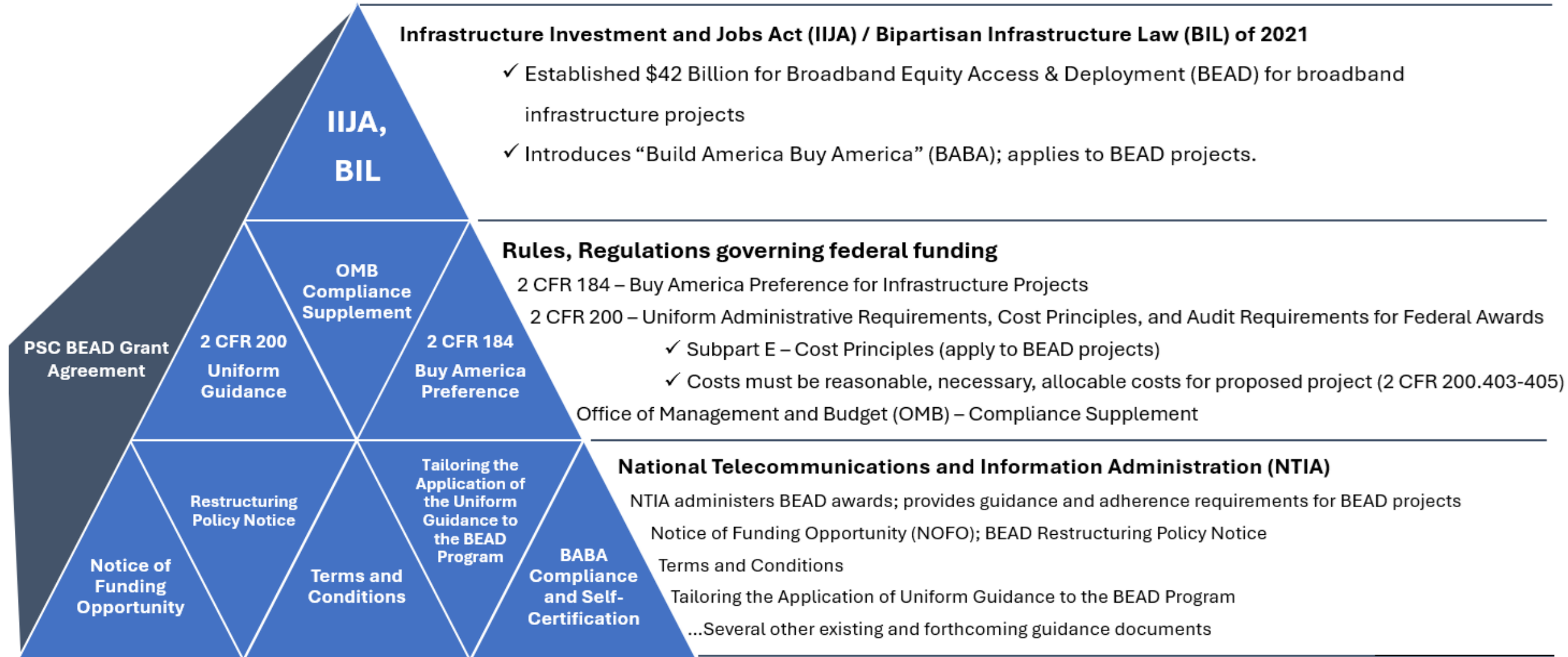
- ✓ [ERF Home](#)
- ✓ [ERF User Manual](#)
- ✓ [ERF FAQ](#)

[Contacts & Communications](#) – details on ERF vs GMS, Contacts and Communications.



BEAD Overview

Regulatory Framework





Programmatic Requirements

**DO NOT COMPLETE ANY IMPLEMENTATION OF YOUR PROJECT
BEFORE YOU RECEIVE A NEPA DECISION MEMO**

- Start the process by submitting a completed BEAD Program Environmental Impacts and Documentation Screening (EIDS) Questionnaire – the sooner the better!
- If anything in your EIDS, scope, or project design changes after submitting, you **must** notify us.
- NEPA-related resources are available on the PSC website

- BABA requires that all iron, steel, manufactured products, and construction materials used in a federally funded infrastructure project are produced in the United States. This applies to any construction, alteration, or repair of broadband infrastructure under the BEAD Program.
- Applies to all iron and steel, all manufactured products, and all construction materials.
- **Corrective action for BABA violations may entail removing and replacing improperly purchased items.**
- **Waivers:**
 - Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference.
 - Department of Commerce Department-Wide Public Interest Waivers for De Minimis Infrastructure Project Purchases, Small Grants, and Minor Components.

- Subrecipients will be **required** to report certain information on finished waived electronics used in BEAD deployments.
- **Documenting BABA Compliance:**
 - BABA compliant manufacturers will furnish certification letters to BEAD Subrecipients certifying that the materials meet the BABA domestic manufacturing requirements.
 - Subs should keep track of these letters down to each individual invoice that they are associated with. The Commission will be monitoring on BABA compliance and reserves the right to ask for these letters at any time.
 - Also applies to subcontractors!
- **BABA Technical Assistance Document**

- The Subrecipient **must** convene preconstruction meeting(s) with utility owners within the project area to facilitate utility locating, eliminate unnecessary costs, maintain construction timelines, and ensure safe and timely locating of facilities.
- At **least 30-days before submitting any request for utility locating** services related to the project area via the One Call System, the Subrecipient **must** provide notice to utility owner(s) of intent to initiate construction in the vicinity of their facility and request a meeting. The meeting request **must** include: a primary point of contact for the Subrecipient, a map of the project construction area, and a timeline for construction.
- Separate meeting for each project
- Evidence of meeting is required to achieve a milestone

Property Standards – Attachment C

- Attachment C of the Grant Agreement outlines general property requirements.
- Federal interest **must** be documented for BEAD-funded property through recording Covenant of Purpose, Use and Ownership and/or UCC-1 filing & Attorneys Certification, depending on the type of property.
- [UCC-1 Filing Technical Assistance Document](#) includes language required for filing
- More guidance to come.

Commercial Entity

Subrecipients that are NOT subject to 2 CFR 200 Subpart F (i.e., commercial entities, including ISPs and cooperatives) that expend \$1,000,000 or more in BEAD grant funds during their fiscal year **must** submit to the Commission either:

- A financial related audit of each Commission awarded BEAD Program grant or subgrants in accordance with Generally Accepted Government Auditing Standards; or
- A program-specific audit for each Commission-awarded BEAD Program grant or subgrants in accordance with the requirements contained in 2 CFR 200.507.

* Audited financial statements of a publicly traded parent company may be sufficient to meet the BEAD Program audit requirements if the statements meet all relevant requirements in the BEAD NOFO, 2 CFR Part 200, and the BEAD General Terms and Conditions.

Non-Federal Entity

All governmental and non-profit Subrecipients (non-federal entities, including tribes) that are **required** to comply with the Single Audit Act Amendments of 1996, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, and the State Single Audit Guidelines issued by the Wisconsin Department of Administration **must** ensure that funds awarded by the Commission are included in the Audit Report. A non-federal Subrecipients that reaches or exceeds the single audit threshold amount of all federal funds expended as defined by 2 CFR § 200.500 Subpart F (\$1 million or more in expenditures) during the non-federal Subrecipient's fiscal year **must** have a single or program specific audit conducted for that year in accordance with the provisions 2 CFR parts 200.500 through 200.521.

Audit Requirements – Section 9.0

Deadlines

- A **commercial** Subrecipient **must** submit Audit Reports to the Commission following the same timeline outlined in 2 CFR § 200.512(a)(1) or by the due date indicated by the Commission, whichever is later.
- A **non-federal** Subrecipient **must** submit Audit Reports to the Federal Audit Clearinghouse and to the Commission following the same timeline outlined in 2 CFR § 200.512(a)(1) or by the due date indicated by the Commission, whichever is later.

The timeline outlined in 2 CFR 200.512(a)(1) is as follows:

*The audit, the data collection form, and the reporting package **must** be submitted within 30 calendar days after the auditee receives the auditor's report(s) or nine months after the end of the audit period (whichever is earlier). The cognizant agency for audit or oversight agency for audit in the absence of a cognizant agency for audit (the Commission) may authorize an extension when the nine-month timeframe would place an undue burden on the auditee. If the due date falls on a Saturday, Sunday, or Federal holiday, the reporting package is due the next business day.*

How to Submit to the Commission

- Audit Reports **must** be submitted to the Commission by uploading appropriate document(s) to the Electronic Records Filing System (ERF) at <http://apps.psc.wi.gov>. Use the Subrecipient BEAD entity docket (e.g., 12XXX-BD-100) and select “data request” as the document type in ERF.

*For more details see the [BEAD Audit Resource Document](#)

Fraud, Waste, and Abuse

Fraud is wrongful or criminal deception intended to result in financial or personal gain. It includes:

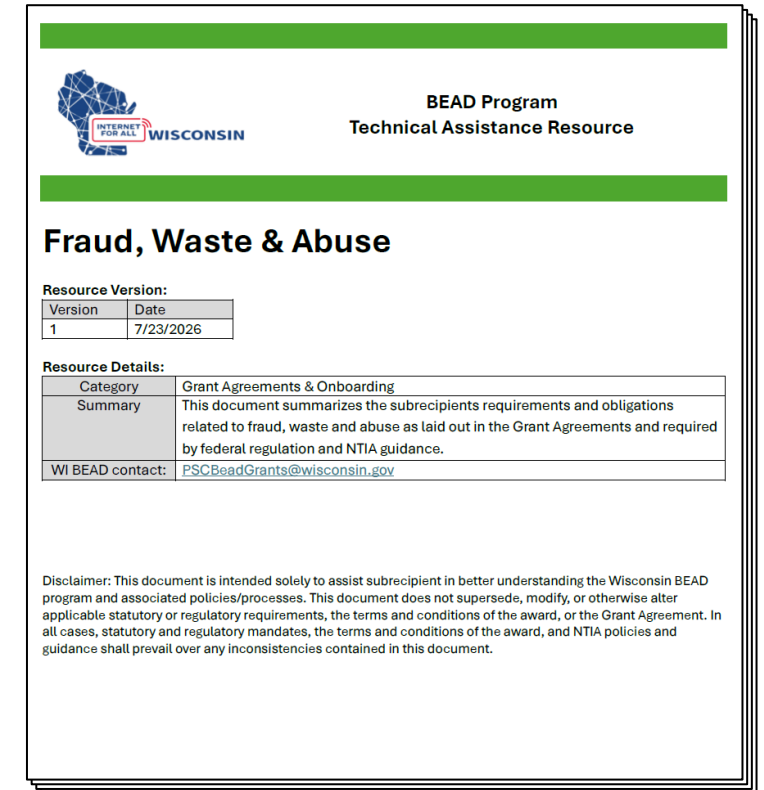
- False representation of facts
- Making false statements
- Concealing information
- Personal purchases with company credit card
- Shell Companies/conflicts of interest

Waste is **thoughtless or careless expenditure, mismanagement, or abuse of resources** that is detrimental or potentially detrimental to the U.S. government. It also includes:

- Incurring unnecessary costs
- Inefficient or ineffective practices, systems, or controls

Abuse is when a Grant or contractor uses federal grant funds or resources in **ways that are not authorized, not for the intended public purpose, or in a manner that benefits themselves** or others at the government's expense. It is distinct from fraud (intentional deception) and waste (extravagant or unnecessary spending), but I can overlap with them.

Fraud, Waste & Abuse Technical Assistance Resource



The image shows the cover of a document titled "BEAD Program Technical Assistance Resource" with a specific section for "Fraud, Waste & Abuse". The document includes a version history table, a resource details table, and a disclaimer.

**BEAD Program
Technical Assistance Resource**

Fraud, Waste & Abuse

Resource Version:

Version	Date
1	7/23/2026

Resource Details:

Category	Grant Agreements & Onboarding
Summary	This document summarizes the subrecipients requirements and obligations related to fraud, waste and abuse as laid out in the Grant Agreements and required by federal regulation and NTIA guidance.
WI BEAD contact:	PSCBeadGrants@wisconsin.gov

Disclaimer: This document is intended solely to assist subrecipient in better understanding the Wisconsin BEAD program and associated policies/processes. This document does not supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the Grant Agreement. In all cases, statutory and regulatory mandates, the terms and conditions of the award, and NTIA policies and guidance shall prevail over any inconsistencies contained in this document.

25.0. Prevention of Waste, Fraud and Abuse

- 25.1. Consistent with the principles in 2 CFR part 200, at any time(s) during the grant period of performance, the Commission or NTIA may direct a member or members of Subrecipient's key personnel to take a government-provided training on preventing waste, fraud and abuse. Key personnel include those responsible for managing the Subrecipient's finances and overseeing any Contractors, Subcontractors or Subrecipients (for financial matters and/or general oversight related to the grant). NTIA or the Commission will provide instructions on when and how to take such training(s), and costs incurred by Subrecipient relative to the training (e.g., staff time) are eligible for reimbursement pursuant to this Agreement.
- 25.2. The Subrecipient **must** monitor award activities for common fraud schemes, including but not limited to: false claims for materials and labor; bribes related to the acquisition of materials and labor; product **substitution**; mismarking or mislabeling on products and materials; and time and materials overcharging. Should the Subrecipient detect any fraud schemes or any other suspicious activity, the Subrecipient **must** contact the Commission point of contact designated this Agreement.
- 25.3. Additionally, in accordance with 2 CFR § 200.113, the Subrecipient **must** disclose, in a timely manner, in writing to the Commission all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Grant Award. The Subrecipient is **required** to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make **required** disclosures can result in any of the remedies described in 2 CFR § 200.339. (See also 2 CFR Part 180, 31 USC § 3321, and 41 USC § 2313.)
- 25.4. The Subrecipient should use the Waste, Fraud and Abuse hotline established by the Commission at 1-800-225-7729 or 1-608-266-2001 (local).

Commission or NTIA may direct a member or members of Subrecipient's key personnel to take a government-provided training on preventing waste, fraud and abuse.

25.0. Prevention of Waste, Fraud and Abuse

- 25.1. Consistent with the principles in 2 CFR part 200, at any time(s) during the grant period of performance, the Commission or NTIA may direct a member or members of Subrecipient's key personnel to take a government-provided training on preventing waste, fraud and abuse. Key personnel include those responsible for managing the Subrecipient's finances and overseeing any Contractors, Subcontractors or Subrecipients (for financial matters and/or general oversight related to the grant). NTIA or the Commission will provide instructions on when and how to take such training(s), and costs incurred by Subrecipient relative to the training (e.g., staff time) are eligible for reimbursement pursuant to this Agreement.
- 25.2. The Subrecipient **must** monitor award activities for common fraud schemes, including but not limited to: false claims for materials and labor; bribes related to the acquisition of materials and labor; product **substitution**; mismarking or mislabeling on products and materials; and time and materials overcharging. Should the Subrecipient detect any fraud schemes or any other suspicious activity, the Subrecipient **must** contact the Commission point of contact designated this Agreement.
- 25.3. Additionally, in accordance with 2 CFR § 200.113, the Subrecipient **must** disclose, in a timely manner, in writing to the Commission all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Grant Award. The Subrecipient is **required** to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make **required** disclosures can result in any of the remedies described in 2 CFR § 200.339. (See also 2 CFR Part 180, 31 USC § 3321, and 41 USC § 2313.)
- 25.4. The Subrecipient should use the Waste, Fraud and Abuse hotline established by the Commission at 1-800-225-7729 or 1-608-266-2001 (local).

Subrecipient **must** monitor award activities for common fraud schemes...

Should the Subrecipient detect any fraud schemes or any other suspicious activity, the Subrecipient **must** contact the Commission point of contact designated in Agreement.

25.0. Prevention of Waste, Fraud and Abuse

- 25.1. Consistent with the principles in 2 CFR part 200, at any time(s) during the grant period of performance, the Commission or NTIA may direct a member or members of Subrecipient's key personnel to take a government-provided training on preventing waste, fraud and abuse. Key personnel include those responsible for managing the Subrecipient's finances and overseeing any Contractors, Subcontractors or Subrecipients (for financial matters and/or general oversight related to the grant). NTIA or the Commission will provide instructions on when and how to take such training(s), and costs incurred by Subrecipient relative to the training (e.g., staff time) are eligible for reimbursement pursuant to this Agreement.
- 25.2. The Subrecipient **must** monitor award activities for common fraud schemes, including but not limited to: false claims for materials and labor; bribes related to the acquisition of materials and labor; product **substitution**; mismarking or mislabeling on products and materials; and time and materials overcharging. Should the Subrecipient detect any fraud schemes or any other suspicious activity, the Subrecipient **must** contact the Commission point of contact designated this Agreement.
- 25.3. Additionally, in accordance with 2 CFR § 200.113, the Subrecipient **must** disclose, in a timely manner, in writing to the Commission all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Grant Award. The Subrecipient is **required** to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make **required** disclosures can result in any of the remedies described in 2 CFR § 200.339. (See also 2 CFR Part 180, 31 USC § 3321, and 41 USC § 2313.)
- 25.4. The Subrecipient should use the Waste, Fraud and Abuse hotline established by the Commission at 1-800-225-7729 or 1-608-266-2001 (local).

Subrecipient **must disclose, in a timely manner, in writing to the Commission all violations of federal criminal law involving fraud, bribery, or gratuity violations**

25.0. Prevention of Waste, Fraud and Abuse

- 25.1. Consistent with the principles in 2 CFR part 200, at any time(s) during the grant period of performance, the Commission or NTIA may direct a member or members of Subrecipient's key personnel to take a government-provided training on preventing waste, fraud and abuse. Key personnel include those responsible for managing the Subrecipient's finances and overseeing any Contractors, Subcontractors or Subrecipients (for financial matters and/or general oversight related to the grant). NTIA or the Commission will provide instructions on when and how to take such training(s), and costs incurred by Subrecipient relative to the training (e.g., staff time) are eligible for reimbursement pursuant to this Agreement.
- 25.2. The Subrecipient **must** monitor award activities for common fraud schemes, including but not limited to: false claims for materials and labor; bribes related to the acquisition of materials and labor; product **substitution**; mismarking or mislabeling on products and materials; and time and materials overcharging. Should the Subrecipient detect any fraud schemes or any other suspicious activity, the Subrecipient **must** contact the Commission point of contact designated this Agreement.
- 25.3. Additionally, in accordance with 2 CFR § 200.113, the Subrecipient **must** disclose, in a timely manner, in writing to the Commission all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Grant Award. The Subrecipient is **required** to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make **required** disclosures can result in any of the remedies described in 2 CFR § 200.339. (See also 2 CFR Part 180, 31 USC § 3321, and 41 USC § 2313.)
- 25.4. The Subrecipient should use the Waste, Fraud and Abuse hotline established by the Commission at 1-800-225-7729 or 1-608-266-2001 (local).

The Subrecipient should use
the Waste, Fraud and Abuse
hotline established by the
Commission at
1-800-225-7729 or
1-608-266-2001 (local).

Semi-Annual Reporting (SAR)

- Project-level reporting that gathers general progress / status information on your project.

Performance Measures; Testing

- Speed and latency information on served locations.
- Reliability

Semi-Annual Reporting – Attachment A 8.0

A8.0. Project Status Reports and Final Project Status Report

A8.1. Per BEAD NOFO VII(E)(2) the Subrecipient **must** submit semiannual Project Status Reports to the Commission for the duration of the project. Additional reporting requirements may be forthcoming.

→ Semi-annual Reporting is **Required**

A8.2. All semiannual status reports **must** be submitted to the Commission via the PSC Grants System using the schedule, templates and questions provided by the Commission.

→ **Must** be completed/submitted in the Grants Management System

A8.3. Subrecipients will be **required** to submit at minimum two semi-annual reports (twice per year) for performance periods January 1 through June 30 and July 1 through December 31.

→ Two reports per year* { Jan-Jun, DUE Jul 10
Jul-Dec, DUE Jan 10

A8.4. Each report shall describe the Project status and/or other eligible activities carried out by responding to the questions provided by the Commission and **must** be certified by the Subrecipient that the information in the report is accurate.

→ Reports will cover project progress

A8.5. Subs **must** comply with any other reasonable reporting requirements determined by the Commission to meet the reporting requirements established by NTIA or the Department of Commerce;

→ Other reporting **may be required** as determined by NTIA and Commission

A8.6. Failure to file timely reports may result in **required** curing, termination of the Grant Award and the claw back of funds up to the Total Award amount.

→ Failure to complete reporting has consequences

***Some Subrecipients may have additional reporting requirements, as outlined in their GA**

- Eligible Entities and Subrecipients **must** ensure that BEAD funded networks comply with the speed, capacity, latency, and availability performance standards outlined in the BEAD NOFO and IJA.
- A Subrecipient **must** test a random sample of their active subscribers in each state for each committed speed tier and technology.

Active Subscribers	Minimum Number of Test Locations
50 or fewer	5 locations
51 – 500	10% of locations
500 or greater	50 locations

Table 1: Test Locations per Active Subscriber Count

- Network performance testing **must** be done annually throughout the period of performance for inclusion in the first SAR of the year and again prior to subgrant close-out.
- The sample set is to be drawn from the locations available for service with an as-of date 7 months prior to the due date of the first Semiannual Report of the calendar year.
 - If a SAR is due January of 2028, then it uses locations reported June of 2027.
 - Additional performance testing must be completed on a project basis at closeout
- [Performance Measures Policy Notice](#)
- More guidance to come.

All Subrecipients should expect to be monitored multiple times during the performance period

Desk Reviews (Virtually):

- Determine compliance with administrative, financial management, BABA, and programmatic operation requirements.
- Desk Review Survey is tailored to the grantee's project and specific needs.
- 30-day notice is provided.

Site Visits (In Person)

- All Subrecipients should expect to have at least 1 site review during the period of performance.
- May be prompted when the intake questionnaire, desk review concerns, or other risk indicator arise regarding capacity to administer the award.
- Conducted in-person.
- May include interviews, tours, field inspections, additional document requests & other items as needed.

Start to prepare now! Common findings include:

- **Record Management** – Record retention schedules that meet the Grant Agreement requirements.
 - Duration of the Performance Period and for 4 years after the close of the project.
- **Drug-Free Workplace** – Your Drug-Free Workplace Policy **must** include the components outlined in 31 CFR Part 20 Subpart B.
- **Contract Administration** – For eligible cost items incurred by Grant contractors, an executed contract that includes pricing and scope of work **must** be provided to the Commission upon request.
- **Internal Controls** – No applicable written procedures provided.
- Fiscal Procedures and Responsibilities Clearly Documented in Written Procedures
 - **Cash to Ledger Account Reconciliation** – Cash balances **must** be reconciled to internal ledgers in a timely manner.
 - **Grant Expense Identification** – Internal systems **must** sufficiently identify grant vs. non-grant expenses.
 - **Time Reporting and Payroll Systems** – Time keeping and payroll systems **must** sufficiently identify actual hours spent working on the grant.

- **Allowable Costs**

- [Documentation of Eligible Costs – Section 1.13](#)
- [2 CFR 200](#)

- **How to Submit Evidence of Costs**

- [Webinar](#)
- [Match Template](#)
 - [Resource](#)

- **Documentation of Evidence of Costs – Section 6.15**

- The Subrecipient **must** submit evidence of costs that have been paid at least every 6 months in alignment with the semi-annual reporting period and **must** promptly request review of any completed milestone not later than 30-days of achieving the milestone.

- [Pre-Award Costs](#)

Milestones - Section 7.0

- Subrecipients are **required** to meet specific performance milestone requirements to receive payment for BEAD awards.
- Section 7.0 of the Grant Agreement outlines the baseline milestones for the award.
- Every item within the milestone **must** be completed to receive the allowable payment for that specific milestone.
- The requirements for each part of every milestone are listed on the “How to Document...” Technical Assistance (TA) documents on our website.

Milestones

Milestone 1		
Actions	Required documentation	How to submit
1. Subrecipient and Commission enter into an executed Grant Agreement which includes: approved scope of work, project budget, network design, details on the low-cost service option, and deployment schedule(s).	Executed Grant Agreement	No submission necessary. Commission will add executed Grant Agreement to Grants Management System (GMS) .
2. Subrecipient submits required Protecting the BEAD Program from Default certification.	Default Certification	Upload to your BEAD Letter of Intent project within the Grants Management System using "Attestation" as the document type.
3. Subrecipient submits Commission Onboarding Questionnaire and documentation.	Completed Onboarding Questionnaire	Complete the questionnaire using this link: https://forms.office.com/g/QGSat36vsH
4. If applicable, subrecipient submits Tribal Consent.	Tribal Consent resolution (if applicable)	Return completed documents to PSCBeadGrants@wisconsin.gov .
5. Subrecipient submits a letter of credit or performance bond for the proper amount accepted by the Commission.	Letter of Credit or Performance Bond	Upload to your BEAD Letter of Intent project within the Grants Management System using "Onboarding" as the document type.
6. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 10% of the BEAD Award. Expenses reviewed and approved by Commission	Documentation of eligible expenses equaling at least 10% of the BEAD award	Submit in the expenses tab of the project in the GMS

Milestone 2		
Actions	Required documentation	How to submit
1. Subrecipient has submitted the BEAD Environmental Impacts and Documentation Screening (EIDs) Packet for the project or one or more sub-project(s).	Complete and accurate EIDS packet submitted for project or at least one sub-project of the project.	Upload to specific BEAD project within the GMS using the "NEPA Environmental Questionnaire" as the document type.
2. Subrecipient has submitted required accompanying GIS files for the project or at least one or more sub-project(s).	Complete and accurate GIS files submitted for at least 1 project or sub-project.	Secure upload link provided by WBO - email pscbeadgrants@wisconsin.gov to request.
3. Subrecipient attests that all required permits have been applied for or that the permit needs to be applied for closer to the planned construction.	Letter attesting that all required permits have been applied for, including a list of permits that have already been applied for and a detailed timeline for applying for the remaining permits.	Upload to specific BEAD project within the GMS using the "Letter" document type.
4. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 20% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of eligible expenses equaling at least 20% of the BEAD award.	Submit in the expenses tab of the project in the GMS .

Milestone 3		
Actions	Required documentation	How to submit
1. Subrecipient has received a NEPA Decision Memo for the entire project or at least one NEPA sub-project and is authorized to begin all or some implementation.	NEPA Decision Memo for the entire project or at least one NEPA sub-project.	No submission necessary. Commission will add NEPA Decision Memo to BEAD Project in GMS .
2. Subrecipient provides evidence of a pre-construction meeting or meeting invitation.	Preconstruction documentation may include the pre-construction meeting minutes with all impacted utilities or if a meeting did not occur, provide a reason why the meeting did not occur and evidence that the subrecipient attempted to contact the affected utility owners to schedule a preconstruction meeting.	Submit the pre-construction meeting documentation to specific BEAD project within the GMS using the "Letter" document type.
3. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 30% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of eligible expenses equaling at least 20% of the BEAD award.	Submit in the expenses tab of the project in the GMS .

Milestone 4		
Actions	Required documentation	How to submit
1. Subrecipient provides documentation that at least 25% of project construction is complete (customers are not required to have service to meet this milestone).	A letter attesting and describing that 25% of construction is complete. This should include justification, such as amount of fiber miles/towers constructed, number of towers upgraded, or another reasonable measure describing how the portion of the project scope that is complete is at least 25%. Optional: Upload as-built GIS data to show 25% complete.	Upload to the specific BEAD project within the GMS using the “Attestation” document type. Optional: Secure upload link for GIS data provided by WBO - email pscbeadgrants@wisconsin.gov to request.
2. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 40% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 40% of the BEAD award.	Submit in the expenses tab of the project in the GMS .
3. Subrecipient provides documentation of 25% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 25% of match requirement.	Submit match using the BEAD Match Template using the Expenses tab of the project in the GMS .

Milestone 5		
Actions	Required documentation	How to submit
1. Subrecipient provides evidence that 25% of the total number of BSLs within the project scope of work have completed construction with these customers able to subscribe and connect to broadband service.	Templated list showing 25% of BSLs have completed (template in progress) AND as-built GIS data reflecting infrastructure deployed to serve these locations.	Additional guidance and template is forthcoming.
2. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 55% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 55% of the BEAD award.	Submit in the expenses tab of the project in the GMS .

“Served” means a location can receive standard installation of broadband services within 10 business days of a request with no charges or delays attributable to the extension of the network of the provider.

Milestone 6		
Actions	Required documentation	How to submit
1. Subrecipient provides evidence that 50% of the total number of BSLs within the project scope of work have completed construction with these customers able to subscribe and connect to broadband service.	Templated list showing 50% of BSLs have completed (template in progress) AND as-built GIS data reflecting infrastructure deployed to serve these locations.	Additional guidance and template are forthcoming.
2. If applicable, subrecipient provides evidence of NEPA approval for all sub-projects.	NEPA Decision Memo for all remaining NEPA subprojects.	No submission necessary. Commission will add NEPA Decision Memo to BEAD Project in GMS .
3. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 70% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 70% of the BEAD award.	Submit in the expenses tab of the project in the GMS .
4. Subrecipient provides documentation of 50% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 50% of match requirement.	Submit match using the BEAD Match Template using the Expenses tab of the project in the GMS .

Milestone 7		
Actions	Required documentation	How to submit
1. Subrecipient provides evidence that 75% of the total number of BSLs within the project scope of work have completed construction with these customers able to subscribe and connect to broadband service	Templated list showing 75% of BSLs have completed (template in progress) AND as-built GIS data reflecting infrastructure deployed to serve these locations. locations.	Additional guidance and template are forthcoming.
2. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 85% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 85% of the BEAD award.	Submit in the expenses tab of the project in the GMS .
3. Subrecipient provides documentation of 75% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 75% of match requirement.	Submit match using the BEAD Match Template using the Expenses tab of the project in the GMS.

Milestone 8		
Actions	Required documentation	How to submit
1. Subrecipient provides evidence that 100% of the scope of work is completed and all required BSLs within the project scope of work have completed construction with all customers able to subscribe and connect to broadband service.	Templated list showing all BSLs have completed (template in progress) AND as-built GIS data reflecting infrastructure deployed to serve these locations.	Additional guidance and template are forthcoming.
2. Subrecipient provides evidence of actual Eligible Costs that equal or exceed 100% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 100% of the BEAD award.	Submit in the expenses tab of the project in the GMS .
3. Subrecipient provides documentation of 100% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 100% of match requirement	Submit match using the BEAD Match Template using the Expenses tab of the project in the GMS .
4. Subrecipient has submitted all grant close out reports.	Final close out reports submitted.	Additional guidance is forthcoming.
5. All required inspections and certification complete.	Additional guidance is forthcoming.	Additional guidance is forthcoming.
6. Subrecipient submits evidence of complete and approved network performance testing.	Final project specific performance testing completed.	Additional guidance is forthcoming.

Milestones – Section 7.0

- Subrecipients **must** promptly request review of any completed milestone not later than 30-days of achieving the milestone.

Grant Project Milestones					
-- Choose Milestone --					
Sort Order	Name	Description	Percent Cap	Request Review of M...	
1	BEAD milestone 1	Executed Grant Agreem...	10	☒	
2	BEAD milestone 2	Subrecipient has submitt...	20	☐	
3	BEAD milestone 3	Subrecipient has receive...	30	☐	
4	BEAD milestone 4	Subrecipient provides do...	40	☐	
5	BEAD milestone 5	Subrecipient provides ev...	55	☐	
6	BEAD milestone 6	Subrecipient provides ev...	70	☐	
7	BEAD milestone 7	Subrecipient provides ev...	85	☐	
8	BEAD milestone 8	Subrecipient provides ev...	100	☐	

- Grant Agreement 22.0
 - 22.2. Subrecipients must notify the Commission of any proposed changes to the **project activities, scope of work, budget, technology, network design, locations, network performance, sources of match funding, any significant changes to deployment milestones or plans, any significant changes to public awareness plans, any request to extend the Period of Performance or any changes or transfer of the ownership of the network or planned services to the customers** as soon as practicable and may only make such changes if the Commission signs an amendment authorizing and memorializing a change. A change in project scope may require additional NEPA compliance and review.
- If you are unsure whether your changes require an amendment, please email the BEAD inbox for guidance. If an amendment is required, your Grants Specialist will work with you to draft the changes. Once the draft is complete, the amendment will be sent to your authorized signatory for signature via DocuSign. Once complete, the amendment will be uploaded to ERF.

- NTIA established standardized [Non-Service Reason Codes](#) to explain why eligible BSLs would not be served
- Used in scope change or no-service requests under [NTIA's BEAD Scope Change and Budget Modification Guidance](#)
- If you believe that a BSL within your project falls within one of the reason codes that would require it to be removed from the project (1-3), reach out to us (with evidence) to have these removed from the project
 - No Broadband Connection
 - No Demand for Mass-Market Broadband Service
 - Removal from FCC's Fabric
- More guidance coming soon

The Commission reserves the right to ask for additional items to ensure compliance, including but not limited to:

- Outreach plans
- As-built engineering plans
- Geo-tagged photos of infrastructure
- Customer contacts
- Permits and communications with permitting authorities
- Other data requests from the Commission or NTIA



Questions?

Ask now!

or

Email: PSCBeadGrants@Wisconsin.gov

Visit: [PSC Broadband Equity, Access, and Deployment Grant](#)